

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Assessment and Collection
of Regulatory Fees for
Fiscal Year 1995

DOCKET FILE COPY ORIGINAL

MD Docket No. 95-3

REPLY COMMENTS OF AMERITECH

Ameritech respectfully files these Reply Comments in the above-captioned matter. This pleading focuses specifically on the suggestion of NECA and others¹ that the revenue-based allocation methodology used by this Commission in the TRS context represents a more appropriate means of assessing regulatory fees than the user-count approaches originally suggested in the Notice of Proposed Rule Making ("NPRM").²

Ameritech supports the use of this method for two reasons. First, this method will capture the broadest possible range of carriers who benefit from the Commission's continued operation. In the TRS context, the Commission selected this methodology pursuant to its Congressional mandate that "costs caused by interstate telecommunications relay services should be recovered from all subscribers to every interstate service."³ The underlying rationale for that mandate, namely that all customers who benefit from the provision of TRS services should share in the funding support responsibility for that service, applies with equal force here.

¹ Comments of National Exchange Carrier Association, at 4; see also, Comments of U S West, at 2-3.

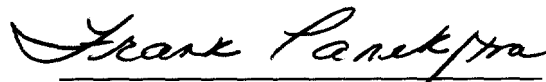
² In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 1995, MD Docket No. 95-3, Notice of Proposed Rulemaking ("NPRM"), released January 12, 1995.

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Second, this approach carries a common-sense appeal, in that a revenue-based allocation effectively spreads the cost recovery burden in proportion to the benefits realized by those carriers who benefit from the Commission's continued efficient and effective operation. Presumably, the use of revenue as a yardstick reflects, albeit in a rudimentary way, the level of commercial benefit realized by each carrier. The choice of the TRS methodology as a cost allocation approach would mirror that proportion of benefit realized.

Respectfully submitted,



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Dated: February 28, 1995

³ Third Report and Order, In The Matter of Telecommunications Relay Services, and the Americans with Disabilities Act of 1990, CC Docket No. 90-571 (released July 20, 1993), at 6.

CERTIFICATE OF SERVICE

I, Deborah L. Thrower do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on the parties listed on the attached service list, by first class mail, postage prepaid, on this 28th day of February 1995.

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